

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION**

No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING  
 CERTAIN FACT SHEET DEADLINES**

This Document Relates to:

Judge: Hon. Charles R. Breyer  
 Courtroom: 6, 17th Floor

ALL ACTIONS

**WHEREAS**, on March 19, 2024, the Court entered Pretrial Order No. 10 that stated the ride receipt or information deadline is to be “within 14 days of filing, transfer, or removal to this Court for all cases filed, transferred, or removed after February 1, 2024.” Mar. 19, 2024 Pretrial Order No. 10: Fact Sheet Implementation Order, Dkt. 348. The Court also set the PFS and DFS deadlines for cases filed after March 26, 2024 as follows: “[E]ach Plaintiff must complete and submit a PFS and execute applicable Authorizations within 30 days of the case being filed in, removed to, or transferred to MDL 3084. The Uber Defendants must complete and submit a DFS and produce Responsive Documents, within 30 days after a given plaintiff serves the ride receipt or ride information form . . . .” *Id.*

**WHEREAS**, on June 26, 2024, the Court entered an order that set a filing cutoff date of 60 days from the order’s date for JCCP cases affected by the Court of Appeal’s JCCP forum non con-

1 veniens opinion (Court's filing cutoff date). *See* June 26, 2024 Order Setting Filing Cutoff Date,  
2 Dkt. 669.

3 **WHEREAS**, on July 17, 2024, the JCCP Plaintiffs requested to extend the Court's filing  
4 cutoff date to 60 days after the Supreme Court grants or denies the petition for review. *See* July 17,  
5 2024 California JCCP Plaintiffs' Motion to Extend the Court's Order Setting Filing Cutoff Date,  
6 Dkt. 700.

7 **WHEREAS**, on July 22, 2024, the Court denied the JCCP Plaintiffs' request. *See* July 22,  
8 2024, Order Denying California JCCP Plaintiffs' Motion to Extend Filing Cutoff Date, Dkt. 709.

9 **WHEREAS**, anticipating approximately 500 cases affected by the Court of Appeal's JCCP  
10 forum non conveniens opinion (the recent WHB cases), on August 14, 2024, Williams Hart &  
11 Boundas, LLP (WHB) reached out to both MDL Co-Lead Counsel and counsel for Defendants Uber  
12 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, the parties) to discuss, among  
13 other things, the extension of the PFS and DFS deadlines applicable to the recent WHB cases. An  
14 extension would provide for more time to submit accurate fact sheets and a uniform deadline for  
15 their submission.

16 **WHEREAS**, the parties agreed the PFSs for the recent WHB cases would be due on No-  
17 vember 1, 2024, the DFSs for the recent WHB cases would be due on January 17, 2025, and these  
18 deadlines may be subject to revision based on further discussion and agreement amongst the parties  
19 (or, in the absence of agreement, via application to the Court) about why changed circumstances  
20 (*e.g.*, a significant additional volume of filings of cases by other law firms) may warrant further ad-  
21 justment to the deadlines. Nothing about this stipulation changes any obligations of the parties with  
22 respect to requirements set out in prior orders as to inclusion of the applicable authoriza-  
23 tions/responsive documents.

24 **THEREFORE**, the parties respectfully request the Court enter the parties' stipulation estab-  
25 lishing PFSs for the recent WHB cases are due on November 1, 2024, DFSs for the recent WHB  
26 cases are due on January 17, 2025, and these deadlines may be subject to further revision as de-  
27 scribed in the preceding WHEREAS clause.  
28

1 **IT IS SO STIPULATED.**

2 Respectfully submitted,

3 Dated: August 19, 2024

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**FILER'S ATTESTATION**

I, Brian Abramson, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: August 19, 2024

By: /s/ Brian Abramson  
Brian Abramson

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The Court hereby GRANTS the parties' stipulation as follows: the PFSs for WHB cases filed on or after July 27, 2024 in connection with the Court of Appeal's JCCP forum non conveniens opinion (the recent WHB cases) are due on November 1, 2024, the DFSs for the recent WHB cases are due on January 17, 2025, and these deadlines may be subject to revision as described in the final WHEREAS clause of the parties' stipulation.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Date: \_\_\_\_\_, 2024

\_\_\_\_\_  
HON. CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE